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VIA ECF

August 15, 2014

The Honorable Denise L. Cote
United States District Judge
Daniel Patrick Moynihan United States Courthouse
Southern District of New York
500 Pearl Street
New York, NY 10007

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8/18/2014

Re: *FHFA v. HSBC North America Holdings, Inc., et al.*, No. 11-cv-6189 (S.D.N.Y.) (DLC)
FHFA v. Goldman, Sachs & Co., et al., No. 11-cv-6198 (S.D.N.Y.) (DLC)

Dear Judge Cote:

I write on behalf of the defendants in the above-referenced actions regarding proposed redactions to materials being filed today in connection with *HSBC's and Goldman Sachs' Consolidated Motions to Exclude Testimony of FHFA Expert Donald Epley, Ph.D.* and *HSBC Defendants' Motion to Exclude Testimony of FHFA Expert John A. Kilpatrick, Ph.D.* The parties have designated as "Confidential" or "Highly Confidential" information and documents included in these submissions. We are therefore filing these submissions with the Court under seal. We respectfully request that the parties be given until Friday, August 22, to meet and confer about proposed redactions, followed by a joint submission to the Court on Friday, August 29, listing the proposed redactions. The parties have met and conferred and FHFA consents to this proposed schedule. Defendants will then file the materials in support of their motions in redacted form as approved by the Court.

MEMO ENDORSED

Respectfully submitted,


Andrew Z. Michaelson

Q. inted.

Y. Michaelson
8/15/14